

*Model for Letters of Request recommended for use in applying the Hague Convention of
18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*

**Request for International Judicial Assistance pursuant to the Hague Convention of
18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters**

N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.

In order to avoid confusion, please spell out the name of the month in each date.

Please fill out an original and one copy of this form (use additional space if required).

1. Sender	United States District Court for the District of Massachusetts One Courthouse Way Boston, MA 02110
2. Central Authority of the Requested State	Hong Kong SAR Chief Secretary of Hong Kong Central Government Offices Laver Albert Road Hong Kong
3. Person to whom the executed request is to be returned	Lawrence Green, Esq. Burns & Levinson, LLP 125 Summer Street Boston, MA 02110
4. Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request	Date: October 1, 2008
Reason for urgency*	

* Omit if not applicable.

IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:

5. a Requesting judicial authority (Article 3, a))

United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02110

- b To the competent authority of (Article 3, a))

Hong Kong SAR
Chief Secretary of Hong Kong
Central Government Offices
Laver Albert Road
Hong Kong

- c Names of the case and any identifying number

Sheldon G. Adelson v. Moshe Hananel
C.A. No.: 04-cv-10357-RCL

6. Names and addresses of the parties and their representatives (including representatives in the requested State*) (Article 3, b))

- a Plaintiff

Sheldon G. Adelson

Representatives

Franklin H. Levy, Esq.
Duane Morris, LLP
470 Atlantic Avenue, Suite 500
Boston MA 02110

- b Defendant

Moshe Hananel

Representatives

Lawrence G. Green, Esq.
Burns & Levinson, LLP
125 Summer Street
Boston, MA 02110

- c Other parties

Representatives

* Omit if not applicable.

7. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract
b	Summary of complaint	Parties' employment agreement for investment options
c	Summary of defence and counterclaim*	
d	Other necessary information or documents*	
8. a	Evidence to be obtained or other judicial act to be performed (Article 3, d))	Examination of witness
b	Purpose of the evidence or judicial act sought	
9.	Identity and address of any person to be examined (Article 3, e))*	Richard Suen c/o John A. O'Malley, Esq. Fulbright & Jaworski LLP 555 South Flower Street 41st Floor Los Angeles, CA 90071
10.	Questions to be put to the persons to be examined or statement of the subject-matter about which they are to be examined (Article 3, f))*	Richard Suen will be examined regarding extensive dealings with Adelson confirming Adelson's early interest in Macau, as initiated by Hananel, and other matters.

* Omit if not applicable.

11. Documents or other property
to be inspected
(Article 3, g)*

12. Any requirement that the
evidence be given on oath
or affirmation and any
special form to be used
(Article 3, h)*

All deposition testimony is to be given under oath.

13. Special methods or procedure
to be followed (e.g. oral or
in writing, verbatim,
transcript or summary,
cross-examination, etc.)
(Articles 3, i) and 9)*

Defendant's counsel is to conduct the depositions.

14. Request for notification of
the time and place for the
execution of the Request
and identity and address of
any person to be notified
(Article 7)*

15. Request for attendance or
participation of judicial
personnel of the requesting
authority at the execution
of the Letter of Request
(Article 8)*

16. Specification of privilege
or duty to refuse to give
evidence under the law of
the State of origin
(Article 11, b))*

17. The fees and costs incurred
which are reimbursable under
the second paragraph of
Article 14 or under
Article 26 of the Convention
will be borne by*

DATE OF REQUEST

July 25, 2008

SIGNATURE AND SEAL OF THE
REQUESTING AUTHORITY